

NO. 13-19-00500-CV

IN THE COURT OF APPEALS FOR THE THIRTEENTH JUDICIAL DISTRICT OF TEXAS
CORPUS CHRISTI/EDINBURG, TEXAS

FILED IN
13th COURT OF APPEALS
7/2/2020 2:28:40 PM

KATHY S. MILLS
Clerk
TEXAS AUTO SALVAGE, INC., GARY HACK AND DANIEL HACK, APPELLANTS

VS.

D D RAMIREZ, INC., DANNY RAMIREZ RECYCLING, INC., SAN ANTONIO AUTO &
TRUCK SALVAGE, DANNY'S RECYCLING & PRECIOUS METALS, LLC, DANNY'S
RECYCLING, INC., AND DANIEL DELAGARZA RAMIREZ, APPELLEES

ORIGINAL PROCEEDING FROM THE 37TH JUDICIAL DISTRICT COURT OF
BEXAR COUNTY, TEXAS
CAUSE No. 2010-CI-02500
THE HONORABLE MICHAEL MERY, PRESIDING

**APPELLANTS' UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME
TO FILE BRIEF OF APPELLANTS**

TO THE HONORABLE JUSTICES OF SAID COURT:

Appellants, Texas Auto Salvage, Inc., Gary Hack and Daniel Hack, ("Appellants") respectfully submit this Unopposed Motion for Extension of Time to File Brief of Appellants. Appellants request a two-week extension of time to **Monday, July 27, 2020**, to file Brief of Appellants. In compliance with Texas Rules of Appellate Procedure 10.5(b)(3), Appellants state the following:

I.

Appellants' Brief is due **July 13, 2020**. Appellants have previously requested one extension to file their brief.

II.

Several factors will prevent counsel for Appellants from completing the Brief by the current deadline, including but not limited to:

1. Counsel for Appellants ("Counsel") is presently preparing for settlement proceedings in Case No. C2018-1057D, *Great American Products, Ltd. v. Atradius Trade Credit Ins. et al.*, in the 433rd District Court of Comal County.
2. Counsel is handling post-trial matters in Counsel in Cause No. 2018-10-32406-CV, *In the Interest of L.S. and W.S.*, in the 38th District Court, Uvalde County, Texas.
3. Counsel has been preparing the Brief of Appellee in Cause No. 04-19-00895-CV, *Thomas Lee Farr, Sr., Farr Investments, L.P. and Farr Ranches, L.L.C. v. Jennifer Jo Barnes and Glenn McDonald* in the Fourth Court of Appeals from the 407th District Court, Bexar County, Texas. The brief was due June 30, 2020.
4. Counsel was preparing the Brief of Appellant in Cause No. 04-20-00051-CV, *Medfinmanager, LLC v. John Salas* in the Fourth Court of Appeals from the 407th District Court, Bexar County, Texas. The brief was due June 30, 2020.
5. Counsel has been having to practice from her home in light of the Coronavirus crisis, first because of the City of San Antonio's order mandating work at home if possible and then because of family health issues that require stricter shelter-in-place requirements. This has diminished Counsel's ability to complete her work.

III.

For the above reasons, Appellants request an extension of two weeks to file their Brief. This extension is not sought for purposes of delay. It is needed because of the previously mentioned matters and commitments, and so that justice will be done.

Counsel for Appellants has conferred with Counsel for Appellees and they have indicated that they do not oppose the motion.

WHEREFORE, Appellants, Texas Auto Salvage, Inc., Gary Hack and Daniel Hack pray that this motion be granted and that time for filing Brief of Appellants be extended two-weeks to July 27, 2020 and grant Appellants all other relief to which they may be entitled.

Respectfully submitted,

/s/ Renée Yanta

RENÉE YANTA

State Bar No. 00787483

THE LAW FIRM OF RENÉE YANTA PLLC

8000 IH-10 West, Suite 600

San Antonio, Texas 78230

Tele: 210-774-4088

formerjudge@reneeyantalaw.com

MR. JON T. POWELL

State Bar No. 0079726

MR. MICKEY JOHNSON

State Bar No. 24094002

THE POWELL LAW FIRM

1148 E. Commerce Street

San Antonio, TX 78205

210.225.9300 t

**Appellate Counsel for Appellants,
Texas Auto Salvage, Inc., Gary Hack and
Daniel Hack**

CERTIFICATE OF CONFERENCE

I certify that I conferred with Appellees' counsel regarding this motion.
Appellees' counsel are unopposed to this motion.

/s/ Renée Yanta
Renée Yanta
ATTORNEY FOR APPELLANTS

CERTIFICATE OF SERVICE

This is to certify that the above and foregoing document was forwarded via efile
service, on July 2, 2020, to the following counsel of record:

GREGORY T. VAN CLEAVE
Texas State Bar No. 24037881
THE LAW OFFICE OF ALBERT W. VAN CLEAVE, III PLLC
1520 W. Hildebrand
San Antonio, Texas 78201

SAMUEL V. "SAM" HOUSTON
Texas State Bar No. 24041135
HOUSTON DUNN, PLLC
4040 Broadway Street, Suite 515
San Antonio, Texas 78209

/s/ Renée Yanta
Renée Yanta
ATTORNEY FOR APPELLANTS

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Denise Newlin on behalf of Renée Yanta
Bar No. 787483
info@Reneeyantalaw.com
Envelope ID: 44227144
Status as of 07/07/2020 15:47:34 PM -05:00

Associated Case Party: San Antonio Auto & Truck Salvage

Name	BarNumber	Email	TimestampSubmitted	Status
Jon Todd Powell	797260	jon@jpowell-law.com	7/2/2020 2:28:40 PM	SENT
John Johnson	24094002	mickey@jpowell-law.com	7/2/2020 2:28:40 PM	SENT
Renee Yanta	787483	info@reneyantalaw.com	7/2/2020 2:28:40 PM	SENT
Renée Yanta		formerjudge@Reneeyantalaw.com	7/2/2020 2:28:40 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Gregory Van Cleave	24037881	Greg_v@vancleavelegal.com	7/2/2020 2:28:40 PM	SENT
Samuel Vance Houston	24041135	sam@hdappeals.com	7/2/2020 2:28:40 PM	SENT